



**MARIN MUNICIPAL
WATER DISTRICT**

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June 23, 1998

CALFED Bay-Delta Program
Attention: Mr Rick Breitenbach
1416 Ninth Street, Suite 1155
Sacramento, CA 95814

Subject: Comments on the CALFED Bay-Delta Program Draft EIS/EIR

Gentlemen:

Thank you for your request to comment on the subject EIS/EIR. In your notice of May 20, 1998 setting out the revised schedule for your Phase II efforts, comments regarding the structure of a phased implementation plan were requested. Our District's experiences over the past 25 years have shown us that the balance between our water supply and demand management opportunities are somewhat fluid and do shift over time. Therefore, we urge CALFED to develop its revised draft Program with an ability to do either periodic or on-going assessment to take advantage of new technology and changes in understanding of the balance between Program elements.

While our District has had a three-pronged approach to overall water reliability in place since 1975, the emphasis on the three elements (water conservation, water recycling and additional water supply) has shifted as different opportunities have presented themselves or as hurdles to implementation have become apparent. During the past 25 years, the District has utilized all three of the elements to a varying extent. At this time we find that about 3% of our total supply is provided through water recycling, and our average use demand has been reduced through water-use efficiency from 1970 levels by approximately 25%. This means that while the number of services has increased by 22% since 1970, our total annual water use has decreased by 10% during that period.

With the advent of 1.6-gallon-per-flush toilets, the District has found that the cost of retrofitting toilets to create reduced demand is only about one-sixth the cost of developing the next block of water supply. With the advent of the horizontal-axis washing machine, it appears that there will be another cost-effective opportunity to reduce demand. While the District is implementing water conservation/water efficiency measures, it is also regularly reviewing possible water recycling opportunities as well as ensuring that it is ready to pursue its next block of imported water.

The proposed CALFED Program solutions are noted for implementation over a 20- to 30-year time frame. It therefore appears that a staged and integrated approach to the CALFED Program elements is an appropriate one. As reported by Governor Wilson and Interior Secretary Babbitt when they met on June 15, 1998, the CALFED Program needs to provide linkage between the various Program elements and identify performance targets against which implementation of the Program will be measured.

As CALFED proceeds with its efforts to prepare a revised Program for review, we urge that your Program provide a framework in which all costs, including environmental, can be considered in evaluating the cost effectiveness of Program elements. We also urge you to ensure that costs of Program element implementation be paid by the beneficiaries because, while the finite aspect of fresh water is acknowledged throughout California, the pricing structure for water in much of the state does not really suggest the true value of the resource. Since the CALFED Program recognizes that there is an existing problem being corrected, it follows that it is existing policy and operation that has created the problem as well as past economic benefits. Therefore, to the extent practical, water costs should be adjusted as soon as possible. In this way, funding for the "fixes" can provide as much of a pay-as-you-go solution as possible and the increased water costs will become an incentive for individuals or agencies to implement water-use efficiencies.

We wish you success in your efforts to bring the various stakeholders together and create a viable Program. It will be the success of your efforts that can lead to increased health of the bay and delta systems which, in turn, will positively effect the coastal waters off the coast of Marin. It is within those waters that the coho salmon and steelhead population, which result from our community's efforts on Lagunitas Creek, go to grow and mature.

Sincerely,



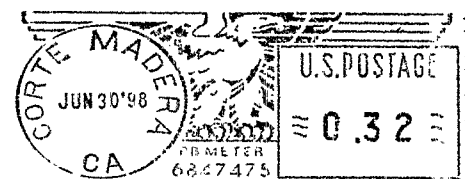
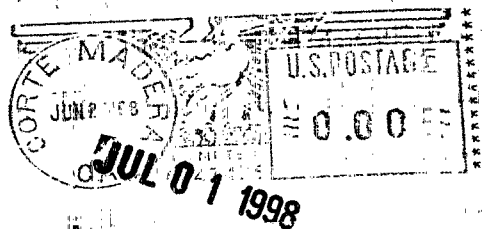
Pamela J. Nicolai
General Manager

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